



## CALIFORNIA STATE UNIVERSITY, LONG BEACH

## DEPARTMENT OF ANTHROPOLOGY

February 14, 2005

Angela Reynolds, Environmental Officer  
Department of Planning & Building: Sports Park DEIR  
City of Long Beach  
333 West Ocean Blvd, 7th Floor  
Long Beach, CA 90802

RE: Response to DEIR for Sports Park

I have reviewed the section on cultural resources and other relevant sections of the DEIR and note that the discussion is limited to archaeological and historical sources. There is no discussion of the possible significance of the site to living Native Californians. Further, there is no indication that the relevant state agency, the Native American Heritage Commission has been consulted, nor has there been consultation with Gabrielino/Tongva Tribal Council or other communities of the Gabrielino/Tongva people.

1

The DEIR gives no indication of the unique history of the people now known as the Gabrielino/Tongva. Living Gabrielino/Tongva are survivors of centuries of genocide and ethnic cleansing, as thoroughgoing as any known to history. They were declared "extinct" by the middle of the twentieth century. Clearly, they are not extinct. For the past few decades they have been re-discovering and re-asserting their ethnic identity within the larger Angelino culture.

2

This history, which is of course inexorably linked with the history of the dominant Euro-American use of the land, deserves special consideration.

There is a strong possibility that the proposed Sports Park will destroy the last remnants of the village of 'Ahwaangna. What will be the impact of such disrespect on communities of living Native Californians? Will they be told, as they are being told in Playa del Vista and San Juan Capistrano, that their heritage is not worth preserving? The DEIR gives no consideration to such questions.

3

It should be noted that the proposed Sports Park is planned to be built on public land. This makes it different from many other Native American sites being destroyed by White development. As is the case with Puvungna on the Cal State Long Beach campus, 'Ahwaanga is protected by Section 5097.94 (g) of the California Public Resources Code, which empowers the Native American Heritage Commission to take appropriate legal action to prevent "severe and irreparable damage to, or assure appropriate access for Native Americans to, a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property."

4

I believe this section of the Public Resources Code places a special responsibility on the City of Long Beach to consider more fully the needs of the Gabrielino/Tonga people, and other Native American peoples in weighing alternatives to the proposed Sports Park.

5

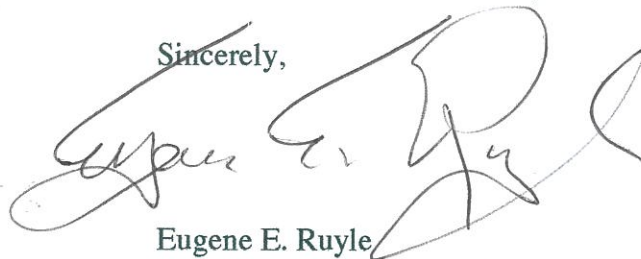
I note that the DEIR does consider "Passive Open Space (Culture/Nature Park) as an alternative, but only to reject it. The alternative is the one proposed by the community, yet the DEIR's tone is clearly negative. It is not clear why walking and bird watching are thought to be more "passive" than drinking beer or watching sports. While it is true that the site has been subject to much disturbance in the past, this is not an excuse for its complete destruction. The oil wells will not be there forever, but the City's plan will effectively destroy the potential of the site for future generations.

6

For these reasons, I believe the DEIR is incomplete and inadequate. It fails to examine the impact of the proposed Sports Park on the Native American community.

7

Sincerely,

A handwritten signature in black ink, appearing to read 'Eugene E. Ruyle', with a large, stylized flourish extending from the end of the signature.

Eugene E. Ruyle  
Professor Emeritus of Anthropology  
California State University, Long Beach

## CALIFORNIA STATE UNIVERSITY, LONG BEACH, DEPARTMENT OF ANTHROPOLOGY

### **O-7-1**

The comment suggests that further consultation with Native American groups or the NAHC is warranted. There is no statutory requirement for this type of consultation. The tribal groups and the NAHC have the opportunity to comment on the project during the scoping meetings and public comment period.

The NAHC was sent an NOP for the project in January 2004. The NAHC was also sent a Draft EIR in December 2004. No comments were received during either comment period. Pursuant to State CEQA Guidelines Section 15082 (b) (2) and 15103, if no response is issued within the 30-day comment period for the NOP, the lead agency may presume that the agency from which comments were requested has no comment.

### **O-7-2**

The comment expresses the author's position about the tribal group Gabrielino/Tongva. The comment is not specific to information included in the Draft EIR. The City acknowledges, and the Draft EIR does not dispute, the existence of living Gabrielino/Tongva peoples, and recognizes their independence and sovereignty.

### **O-7-3**

The comment states, "there is a strong possibility that the proposed Sports Park will destroy the last remnants of the village of 'Ahwaangna'." There is no physical evidence that this village was located within the project site. No archaeological resources have ever been recorded within the project site, and there is no evidence on the ground of any village (e.g., midden soils, ecofactual shell, artifacts, etc.). Please see Responses to Comments O-3-2 and O-3-4 for more information.

### **O-7-4**

This comment assumes that "Ahwaangna," an ethnographic village, exists within the project site. As discussed earlier, there is no evidence of this village in the project site. Other ethnographic villages within the Los Angeles Basin (e.g., Puvunga, Putiidhem, and Panhe) demonstrate their existence with extensive cultural materials including (but not limited to) midden soils, artifacts and tools, human remains, and ecofactual shell and bone. There is no such evidence of a village within the Long Beach Sports Park project limits. Please see Responses to Comments O-3-2 and O-3-4.

The comment refers to the requirements of Public Resources Code Section 5097.94 (g); however, there is no evidence (from either the records search or the cultural resource surveys conducted for the project) of a "Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine" on the project site.

**O-7-5**

The comment assumes the presence of a prehistoric Native American village on site, an assumption that has not been supported by the evidence in the record. Please see Responses to Comments O-3-2 and O-3-4. The cultural resource compliance work completed for the project Draft EIR was designed to comply with the requirements of CEQA. At the time the work was completed, and at the present time, there is no CEQA requirement for Native American consultation. The tribal groups and NAHC have had the opportunity to comment on the project during the scoping meetings and the public comment period.

**O-7-6**

The comment assumes the presence of the village. Please see Response to Comment O-7-5. The comment also expresses an opinion in support of the Passive Open Space (Culture/Nature Park) Alternative that was considered but rejected for further consideration and analysis in the Draft EIR. This comment will be available to the decision-makers for their consideration.

**O-7-7**

This comment closes the letter and states that the Draft EIR is incomplete and inadequate for reasons provided in Responses to Comments O-7-1 through O-7-6. The City respectfully disagrees with this opinion. The Draft EIR fully discloses all relevant environmental analyses related to the Proposed Project as required by CEQA. This opinion will be made available for consideration by the decision-makers as part of their determination regarding the Proposed Project. Because there are no facts or analysis provided in the comment, no further response is necessary.